

August 22, 2016

The Honorable Tom Wheeler
Chairman
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

Re: Business Data Services in an Internet Protocol Environment, WC Docket No. 16-143; Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans, WC Docket No. 15-247; Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, RM-10593

Dear Chairman Wheeler:

On behalf of TechNet, the nation's preeminent, bipartisan network of innovation economy CEOs and senior executives, I am writing to comment on the Federal Communication Commission's proposal (FCC 16-54) regarding new regulatory obligations on providers of Business Data Services (BDS).

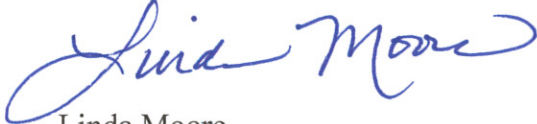
With the rapid evolution of technologies, rising consumer and commercial demand for data, and the dawn of the "Internet of Things," fast and reliable broadband is no longer a luxury for businesses – it is a necessity. That is why TechNet is a strong advocate for telecommunications policy and regulation that promotes continued private investment in broadband networks.

There is a tremendous need for continued investment in broadband to reach commercial locations, including office buildings, anchor institutions, and wireless cell sites, to meet the ever-increasing demand for data in every commercial setting, including businesses, hospitals, libraries, or educational institutions. A wide range of entities relies on BDS to access the Internet and to enable reliable and secure communications among locations. As demand for BDS has soared in recent years, so too has investment in these services, as incumbent providers work to upgrade their networks and competitive new entrants expand their facilities into new areas.

The FCC should adopt policies that eliminate barriers and promote this continued fiber deployment with its associated economic and societal benefits. We urge the Commission to be thoughtful in addressing this increasingly competitive marketplace, and ensure that a framework is maintained for continued broadband deployment and the resulting job creation and economic growth.

We urge the Commission to consider these issues carefully as it determines whether and how to regulate the BDS marketplace.

Sincerely,



Linda Moore
President & CEO